

Message

From: Shari Ring [Shari.Ring@cadmusgroup.com]
Sent: 2/2/2021 2:12:09 PM
To: Ho, Yenhung [Ho.Yenhung@epa.gov]
CC: Rao, Kate [Rao.kate@epa.gov]
Subject: RE: [EXT] FW: Follow-up tech review comments letter for CES
Attachments: Cadmus evaluation of CES responses to RAI 3 (modeling and operations) 1-26-21(DA+SR).docx; Evaluation of responses to RAI 4 (Construction) 1-26-21 (DA+SR).docx; Evaluation of CES response RAI 1 (Site characterization) 1-26-21(DA+SR).docx; Evaluation of responses to RAI 4 (TM) 1-26-21(DA+SR).docx; Cadmus evaluation of CES responses to RAI 2 (FR and ERR) 1-26-21(DA+SR).docx

Hi Calvin,

Please see the attached updates. I addressed all of David's comments and checked that each follow up question is clear regarding timing. (Most of the follow up questions can be addressed now, btw.)

I also added a note to the header of each evaluation indicating whether EPA expects that all of the questions can be answered based on available information or notes that some cannot be fully addressed until the well is constructed and pre-operational testing is performed.

The most critical things to know prior to construction will be: details about the injection well and any monitoring wells that will be drilled prior to updating the modeling. This is to ensure that (1) the wells will be properly constructed and (2) that there is adequate financial responsibility. For everything else, there is no potential USDW endangerment until injection begins. However it will be good to have a common understanding of what EPA will need to know before it will allow CES to inject. Having a list of these (as we discussed) will be very useful. In addition to being a good tracking tool for us we may want to share it with CES.

Please let me know if you have any questions.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Monday, February 1, 2021 12:04 PM
To: Shari Ring <Shari.Ring@cadmusgroup.com>
Cc: Rao, Kate <Rao.kate@epa.gov>
Subject: [EXT] FW: Follow-up tech review comments letter for CES

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Hi Shari,

Please address David's comments in the attachments. It looks like most of his comments are about clarity of the timing of anticipated revised plans/submittals. For examples, in some cases we mean after construction and before authorization to inject while in other cases we mean now, before we can issue an ATC permit.

We don't want CES to have any confusion on our expectations about timing when they see the follow-up tech review letter this week.

Thanks,
Calvin